



Hughes Hubbard & Reed LLP
One Battery Park Plaza
New York, New York 10004-1482
Office: +1 (212) 837-6000
Fax: +1 (212) 422-4726
hugheshubbard.com

October 25, 2024

VIA ELECTRONIC CASE FILING

Honorable Justin T. Quinn, U.S.M.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building and Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: *His All Holiness Bartholomew I, et al. v. Princeton University*
Civil Case No. 3:18-cv-17195-RK-JTQ

Dear Judge Quinn:

We represent Plaintiffs His All Holiness Bartholomew I, the Holy Metropolis of Drama, and the Monastery of Theotokos Eikosiphoinissa in the action referenced above. This letter provides an interim report on Plaintiffs' compliance with the Court's October 11, 2024 Order.

Although the Order does not set a deadline for compliance, our goal has been to establish compliance, or report why that is not possible, within two weeks of the Order's entry. We believe that is consistent with the Court's expectations announced at the October 8 hearing on this matter. As noted below, Plaintiffs respectfully request one more week, until Friday, November 1, 2024, to finalize our report on Plaintiffs' response to the Order. For their part, Defendant's counsel has graciously consented to the proposed additional time.

We understand that Metropolitan Dorotheos, the current Metropolitan of the Holy Metropolis of Drama, forwarded copies of the Court's October 11, 2024 Order, in English and Greek, to Professor Papazoglou. However, when the Metropolitan subsequently called Professor Papazoglou, the Professor was not reachable on his cell phone. We have already instructed the Metropolitan that he must visit Professor Papazoglou if that is reasonably practical.

We are still trying to confirm the details of the Monastery's interaction with Professor Papazoglou. But, as noted in our letter earlier this week, we believe that the Monastery's new Abbess has complied with the Order. Unfortunately, we understand that Professor Papazoglou told the Abbess that he would not sit for the ordered deposition.

We are continuing to communicate with the Patriarchate and trying to get a final response.

We briefed Defendant's counsel on the foregoing today. As noted, counsel consented to a further week for Plaintiffs to try to achieve compliance with the Order. Of course, we defer to the Court on whether that additional time is appropriate.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Eric Blumenfeld', with a stylized, looping flourish at the end.

Eric Blumenfeld

cc: All Counsel of Record (via electronic case filing)